

FACTS REGARDING RADIO-CONTROLLED MODEL AVIATION

1. The miniature aircraft affected by the FCC frequency proposal (PR Docket 92-235) should not be confused with radio-controlled toys commonly available at mass marketing outlets.
2. The average model weighs between 5 and 12 pounds, spans 5 to 7 feet and flies at speeds between 70 and 100 mph. Other, more specialized and elaborate models may reach speeds of up to 200 mph and may weigh as much as 55 pounds. Larger models exist, but are flown only when rigid pre-flight procedures have been met.
3. In addition to many non-representational "sport" designs, radio-controlled models replicate the complete range of full-scale aircraft, including multi-engine, commercial, aerobatic, vintage military and civilian types plus helicopters, jets and sailplanes. The majority of the models are built from kits, but many are designed and constructed "from scratch" by craftsman-operators.
4. A minimum outlay of about \$500 is necessary to "get a start" in the sport. Participants' investments average \$3,000-\$5,000, and individual commitments in excess of \$10,000 are commonplace.
5. Apart from the financial outlay required, the cultivation of considerable skill and discipline is necessary to ensure successful, safe operation of radio-controlled model aircraft.
6. Hundreds of user-maintained flying sites have been established on public and private lands. Clubs—usually numbering 50-300 members—are typically responsible for site management and operational safety. Safety is foremost among the concerns of users as well as site providers, many of which are park system administrations.
7. Estimates of participation are unreliable, but conservative numbers suggest that there are between 300,000 and 400,000 devotees to the sport.
8. Roughly 160,000 of the most active enthusiasts are members of the Academy of Model Aeronautics, a Reston, VA-based organization concerned with flying safety, competition conduct and guidance, liability underwriting, FCC liaison and other matters affecting the avocation and its participants.

SUMMARY:

If adopted, the FCC proposal (as outlined in PR Docket 92-235), would insert additional frequencies in a manner which ignores their activation's potential to interfere with the radio link between radio-controlled models and their operators' transmitters.

In addition to losses which would be sustained by the operators of affected models, it should be apparent that even "average" models can represent a significant hazard to any and all individuals and property at or near flying sites if their control integrity is compromised.

For these and other reasons, the structure of the proposal reveals a profound lack of technical acumen and/or concern for the public interest on the part of its originators, and the necessity to marshal and commit resources for opposition to such a proposal constitutes an unjustifiable imposition on present users of the subject frequency band.

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JAN 26 1993

Jan 20, 1993

JAN 27 1993

FCC - MAIL ROOM

FCC
1919 M St. NW
Washington DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

DOCKET FILE COPY ORIGINAL

Dear Sir(s),

I have been interested in aviation for many years and I am now active in the Coeur d' Alene Aeromodeling Society whose 122 members enjoy building and flying radio controlled model airplanes. I am very concerned about proposed rules now under consideration by the Federal Communications Commission (FCC), namely NPRM-PR Docket 92-235. If adopted, the new rules will greatly reduce the useability of frequencies currently assigned for model use and increase the risk of accidents and attendant liability for controlling model airplanes.

Our radio control frequencies are in the 72-76 MHz band which is primarily used for private land dispatch operations. At this time our assigned frequencies in this band are far enough apart from the land mobile frequencies that we are able to share the band without any mutual interference. Now the FCC wants to create more land mobile frequencies by splitting them into narrower bandwidths and rearranging the band plan. If this is adopted, many land frequencies will move closer to the model aircraft radio control frequencies and very likely cause interference with control of model aircraft. The proposed plan would effectively reduce good, available aircraft channels from about 50 down to 19.

When we fly our model aircraft under radio control, we go to great lengths to assure the safety of operators and spectators and protect property. Many of our safety precautions involve the careful coordination and use of radio control frequencies. If the number of useable frequencies is reduced as proposed by the FCC, the remaining frequencies will become congested and the margin of safety greatly decreased.

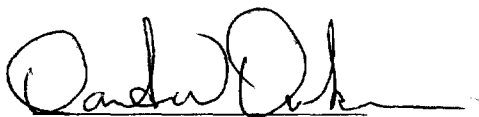
Please understand that many model aircraft have wing-spans up to 10 feet and weigh as much as 35-40 pounds. The models themselves are expensive to build; but more to the point, they are capable of causing property damage, serious injury or even death if radio interference causes the operator to lose control of the aircraft.

We often fly our models at organized events and contests where hundreds of operators participate. We need the use of the full complement of our assigned radio frequencies in order to insure a safe flying environment.

I do not think it wise of the FCC to seek to improve the operating conditions of land mobile radio users at the expense of radio control modelers. Please consider that we have a substantial investment in our models and our radio equipment, that the hobby provides hours of enjoyment to thousands of people like myself and contributes to the advancement of the aviation industry. Please help me continue the safe enjoyment of my hobby by carefully considering the proposals in NPRM-PR Docket 92-235.

Sincerely,

Name



Address

PO BOX 43 HAYDEN ID 83835

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JAN 27 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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JAN 26 1993

FCC - MAIL ROOM

Jan 20, 1993

FCC
1919 M St. NW
Washington DC 20554

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Please understand that many model aircraft have wing-spans up to 10 feet and weigh as much as 35-40 pounds. The models themselves are expensive to build; but more to the point, they are capable of causing property damage, serious injury or even death if radio interference causes the operator to lose control of the aircraft.

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Sincerely,

Name W. L. Knerl

Address 308 W. 13th

Post Falls, ID. 83854

DOCKET FILE COPY ORIGINAL RECEIVED

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JAN 26 1993

JAN 27 1993

FCC - MAIL ROOM

Date: Jan. 22, 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

J. E. NOHRDEN
116 Prospect Court
Santa Cruz, Calif. 95065

Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Dear Sirs:

It has recently come to my attention that the Federal Communications Commission (FCC) is considering an action that will severely limit and potentially eliminate a very important hobby of mine; radio controlled (R/C) model airplanes, helicopters, cars and boats.

Your Notice of Proposed Rule Making (NPRM) in **PR Docket 92-235** replaces Part 90 of your rules with a new Part 88. Part 90 allows for safe use of R/C aircraft and surface models by keeping 10 Khz spacing between fixed commercial users and frequencies used by R/C enthusiasts. The new Part 88 will allow mobile users on frequencies within 2.5 Khz of frequencies available to us, eliminating safe use of at least 31 of the 50 channels on the 72 MHz band and 10 of the 30 frequencies on the 75 MHz band now used by hobbyists. In fact, more channels will likely be affected.

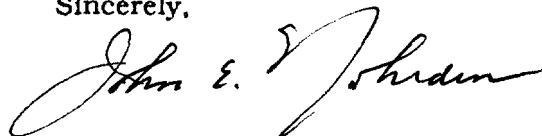
This action will have a severe, detrimental impact upon me and the entire R/C hobby industry. If put into effect, my airplane or helicopter could easily be shot out of the sky by a mobile user I'd have no way of knowing about. This creates a severe health hazard.

I have been involved in this hobby for 33 years. I own 3 radios and 10 model airplanes, helicopters, cars and boats. In addition, I have numerous engines, motors, chargers, field accessories and other products necessary to support my hobby. When you consider there are hundreds of thousands of other R/C hobbyists in the U.S. just like me, these proposed rule changes will affect a lot of people economically and in terms of enjoyment.

I urge you to reconsider this. Keep 10 Khz spacing between all frequencies on 75 MHz and 72 MHz bands available for safe use by R/C enthusiasts. Please don't eliminate this hobby that has grown tremendously over the past 30 years and has so much investment of money and enjoyment of people nationwide.

Thank you for your consideration.

Sincerely,



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JAN 26 1993

FCC MAIL ROOM

January 20, 1993

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JAN 27 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Dear Sirs:

I am employed at a hobby distribution company that sells mostly radio controlled hobby products. It is a good job that provides steady income for me and my family.

It appears that the Federal Communications Commission (FCC) is considering an action that will put my company and, therefore, my job in jeopardy. The proceeding is PR Docket 92-235.

In that action, I understand that by 1996 mobile users of other electronic equipment for voice communications, inventory control, bar code readers and the like would be able to use frequencies within 2.5 KHz of the radio frequencies used by our customers—R/C modelers. Now, there is safe spacing of 10 KHz between fixed commercial users and our frequencies.

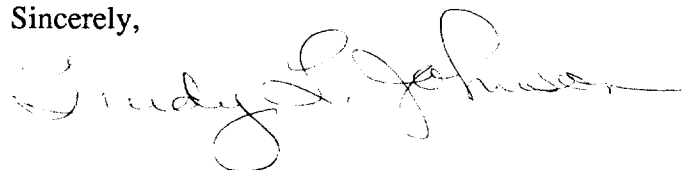
Putting your 92-235 into effect will eliminate safe use of many frequencies now used by R/C modelers on the 72 and 75 MHz bands. This not only creates a health hazard but will really hurt the R/C hobby business, possibly costing me my job.

In an economic time when jobs are hard to come by, I hope you won't take this action and eliminate thousands of jobs related to this industry as well as the pastime of hundreds of thousands of modelers across the U.S.

I urge you to reconsider this. Keep 10 KHz spacing between all frequencies on 75 and 72 MHz bands as the rule now stands.

Thank you for your consideration.

Sincerely,



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JAN 24 1993

JAN 27 1993

FCC MAIL ROOM

Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re: PR Docket 92-235
Deadline: Feb. 26, 1993

Dear Sirs:

It has recently come to my attention that the Federal Communications Commission is considering an action that will severely limit and potentially eliminate a very important hobby of mine, radio controlled (R/C) model airplanes, helicopters, cars and boats.

Your Notice of Proposed Rule Making (NPRM) in PR Docket 92-235 replaces Part 90 of your rules with a new Part 88. Part 90 allows for safe use of R/C aircraft and surface models by keeping 10 Khz spacing between fixed commercial users and frequencies used by R/C enthusiasts. The new Part 88 will allow mobile users on frequencies within 2.5 Khz of frequencies available to us, eliminating safe use of at least 31 of the 50 channels on the 72 MHz band and 10 of the 30 frequencies on the 75 MHz band now used by hobbyists. In fact, more channels will likely be affected.

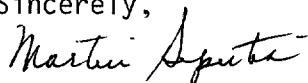
This action will have a severe, detrimental impact upon me and the entire R/C hobby industry. If put into effect, my airplane or helicopter could easily be shot out of the sky by a mobile user I'd have no way of knowing about. This creates a severe health hazard.

I have been involved in this hobby for 25 years. I am very active in a local club whose members enjoy constructing and operating radio-controlled model airplanes, and have been a member of the American Model Association since 1984. I own 13 radios and 13 model airplanes, helicopters, cars and boats. In addition, I have numerous engines, motors, chargers, field accessories and other products necessary to support my hobby. When you consider there are hundreds of thousands of other R/C hobbyists in the U.S. just like me, these proposed rule changes will affect a lot of people economically and in terms of enjoyment.

I urge you to reconsider this. Keep 10 Khz spacing between all frequencies on 75 MHz and 72 MHz bands available for safe use by R/C enthusiasts. Please do not eliminate this hobby that has grown tremendously over the past 30 years and has so much investment of money and enjoyment of people nationwide.

Thank you for your consideration.

Sincerely,



Martin Seputis
6212 W. 86th Place
Burbank, Illinois 60459

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JAN 27 1993

JAN 27 1993

FEDERAL COMMUNICATIONS COMMISSION
Ted Rixhold
1163 S. Euclid Ave
Oak Park, IL 60304

TELEPHONE ROOM

The Honorable Carol Moseley-Braun
United States Senate
Washington, D.C. 20510

DOCKET FILE COPY ORIGINAL

Re: Federal Communications Commission PR Docket 92-235

Dear Senator Braun,

The referenced docket number refers to a radio frequency re-distribution proposal currently under consideration by the FCC. If adopted, the proposal would seriously compromise the viability of frequencies presently assigned for the hobby of radio controlled model aircraft.

As it stands, the proposal would add commercial usage frequencies in a manner which would cause control impairment of models in flight and during ground operations. This would result in an intolerable hazard to individuals and property at or near established, locally approved sites where radio controlled model aircraft are flown.

Please refer to the attached enclosure for facts regarding the nature of the models and their operation. The national aeromodeling organization is the Academy of Model Aeronautics in Reston, VA.

As a user of the present FCC frequency accommodation for aeromodeling, I can assure that the proposal will virtually eliminate a worthy and gratifying hobby that I was introduced to as a pre-teen. I learned the basics of aerodynamics and developed building and design skills that have helped me in countless ways throughout the years. This modification would also render my recent investment in new radio equipment useless.

Please consider interceding on the radio controlled modelers' behalf by urging the FCC to heed these concerns as they will be articulated in a Formal Letter of Comment to be presented by the Academy of model Aeronautics via their counsel. The identification of the proposal, again, is PR Docket 92-235, and the deadline for Comment is 02/26/93.

In doing so, you will be helping preserve one of the very few and very small segments of the public airwaves that are still available for non-commercial use the American public.

Sincerely,

cc: FCC, AMA

FACTS REGARDING RADIO-CONTROLLED MODEL AVIATION

1. The miniature aircraft affected by the FCC frequency proposal (PR Docket 92-235) should not be confused with radio-controlled toys commonly available at mass marketing outlets.
2. The average model weighs between 5 and 12 pounds, spans 5 to 7 feet and flies at speeds between 70 and 100 mph. Other, more specialized and elaborate models may reach speeds of up to 200 mph and may weigh as much as 55 pounds. Larger models exist, but are flown only when rigid pre-flight procedures have been met.
3. In addition to many non-representational "sport" designs, radio-controlled models replicate the complete range of full-scale aircraft, including multi-engine, commercial, aerobatic, vintage military and civilian types plus helicopters, jets and sailplanes. The majority of the models are built from kits, but many are designed and constructed "from scratch" by craftsman-operators.
4. A minimum outlay of about \$500 is necessary to "get a start" in the sport. Participants' investments average \$3,000-\$5,000, and individual commitments in excess of \$10,000 are commonplace.
5. Apart from the financial outlay required, the cultivation of considerable skill and discipline is necessary to ensure successful, safe operation of radio-controlled model aircraft.
6. Hundreds of user-maintained flying sites have been established on public and private lands. Clubs—usually numbering 50-300 members—are typically responsible for site management and operational safety. Safety is foremost among the concerns of users as well as site providers, many of which are park system administrations.
7. Estimates of participation are unreliable, but conservative numbers suggest that there are between 300,000 and 400,000 devotees to the sport.
8. Roughly 160,000 of the most active enthusiasts are members of the Academy of Model Aeronautics, a Reston, VA-based organization concerned with flying safety, competition conduct and guidance, liability underwriting, FCC liaison and other matters affecting the avocation and its participants.

SUMMARY:

If adopted, the FCC proposal (as outlined in PR Docket 92-235), would insert additional frequencies in a manner which ignores their activation's potential to interfere with the radio link between radio-controlled models and their operators' transmitters.

In addition to losses which would be sustained by the operators of affected models, it should be apparent that even "average" models can represent a significant hazard to any and all individuals and property at or near flying sites if their control integrity is compromised.

For these and other reasons, the structure of the proposal reveals a profound lack of technical acumen and/or concern for the public interest on the part of its originators, and the necessity to marshal and commit resources for opposition to such a proposal constitutes an unjustifiable imposition on present users of the subject frequency band.

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OFFICE OF THE SECRETARY

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JAN 27 1993

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Ted Huxhold
1163 S. Euclid Ave
Oak Park, IL 60304

The Honorable Paul Simon
United States Senate
Washington, D.C. 20510

RECEIVED ROOM

Re: Federal Communications Commission PR Docket 92-235

Dear Senator Simon,

The referenced docket number refers to a radio frequency redistribution proposal currently under consideration by the FCC. If adopted, the proposal would seriously compromise the viability of frequencies presently assigned for the hobby of radio controlled model aircraft.

As it stands, the proposal would add commercial usage frequencies in a manner which would cause control impairment of models in flight and during ground operations. This would result in an intolerable hazard to individuals and property at or near established, locally approved sites where radio controlled model aircraft are flown.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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JAN 26 1993

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DOCKET FILE COPY ORIGINAL

Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

RE P.R. Docket 92-235

Robert M. Mezzanetti
2238 So. Norfolk St.
San Mateo, Ca. 94403

Jan. 22, 1993

Dear Sirs:

I have been actively involved in model aviation for the past five years. While it is a hobby and sport, for me it also provides an essential therapeutic therapy since I am disabled and unable to stand or walk for over 10 or 15 minutes at a time.

I have invested over \$2,000 in electronic equipment in addition to models, engines and other items purchased from four local hobby shops. I spend many hours reading and building models. The culmination of these efforts is in flying these aircraft.

I belong to a club locally of about 150 members who, like me, enjoy constructing and operating model aircraft.

I am very disturbed by proposed rules under current consideration by the Federal Communication Commission (FCC). The proceeding is FR Docket 92-235. If adopted it would virtually eliminate 31 of 50 channels now allocated to radio controlled miniature aircraft, a multi-million dollar industry.

Some of my equipment would be made worthless.

Model aircraft operate in the 72-76 MHz band with 20 MHz channel separation allowing a 10 MHz safety zone on either side of each channel.

The proposed rules changes would allow additional broadcasting by communication equipment, pagers, mobil phones, etc to be sandwiched in among these channels and at a higher output. The result will be radio interference with those bands now allocated to model aircraft.

The end result will be my loss of equipment and unsafe flying conditions.

Please allow the current frequency spacing to remain in force.

Sincerely,
Robert M. Mappinetti

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JAN 27 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

JAN 26 1993

January 20, 1993

RECEIVED MAIL ROOM

Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Dear Sirs:

I am employed at a hobby distribution company that sells mostly radio controlled hobby products. It is a good job that provides steady income for me and my family.

It appears that the Federal Communications Commission (FCC) is considering an action that will put my company and, therefore, my job in jeopardy. The proceeding is PR Docket 92-235.

In that action, I understand that by 1996 mobile users of other electronic equipment for voice communications, inventory control, bar code readers and the like would be able to use frequencies within 2.5 KHz of the radio frequencies used by our customers—R/C modelers. Now, there is safe spacing of 10 KHz between fixed commercial users and our frequencies.

Putting your 92-235 into effect will eliminate safe use of many frequencies now used by R/C modelers on the 72 and 75 MHz bands. This not only creates a health hazard but will really hurt the R/C hobby business, possibly costing me my job.

In an economic time when jobs are hard to come by, I hope you won't take this action and eliminate thousands of jobs related to this industry as well as the pastime of hundreds of thousands of modelers across the U.S.

I urge you to reconsider this. Keep 10 KHz spacing between all frequencies on 75 and 72 MHz bands as the rule now stands.

Thank you for your consideration.

Sincerely,

Jeri Kirby

Jan 20, 1993

FCC
1919 M St. NW
Washington DC 20554

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JAN 27 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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JAN 26 1993

F. C. MAIL ROOM

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I do not think it wise of the FCC to seek to improve the operating conditions of land mobile radio users at the expense of radio control modelers. Please consider that we have a substantial investment in our models and our radio equipment, that the hobby provides hours of enjoyment to thousands of people like myself and contributes to the advancement of the aviation industry. Please help me continue the safe enjoyment of my hobby by carefully considering the proposals in NPRM-PR Docket 92-235.

Sincerely,

Name

Glen W. Dunham

Address

PO Box 43 Hayden Id 83835

Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Dear Sirs:

It has recently come to my attention that the Federal Communications Commission (FCC) is considering an action that will severely limit and potentially eliminate a very important hobby of mine, radio controlled (R/C) model airplanes, helicopters, cars and boats.

Your Notice of Proposed Rule Making (NPRM) in **PR Docket 92-235** replaces Part 90 of your rules with a new Part 88. Part 90 allows for safe use of R/C aircraft and surface models by keeping 10 Khz spacing between fixed commercial users and frequencies used by R/C enthusiasts. The new Part 88 will allow mobile users on frequencies within 2.5 Khz of frequencies available to us, eliminating safe use of at least 31 of the 50 channels on the 72 MHz band and 10 of the 30 frequencies on the 75 MHz band now used by hobbyists. In fact, more channels will likely be affected.

This action will have a severe, detrimental impact upon me and the entire R/C hobby industry. If put into effect, my airplane or helicopter could easily be shot out of the sky by a mobile user I'd have no way of knowing about. This creates a severe health hazard.

I have been involved in this hobby for 4 years. I own 2 radios and 2 model airplanes, helicopters, cars and boats. In addition, I have numerous engines, motors, chargers, field accessories and other products necessary to support my hobby. When you consider there are hundred of thousands of other R/C hobbyists in the U.S. just like me, these proposed rule changes will affect a lot of people economically and in terms of enjoyment.

I urge you to reconsider this. Keep 10 Khz spacing between all frequencies on 75 MHz and 72 MHz bands available for safe use by R/C enthusiasts. Please don't eliminate this hobby that has grown tremendously over the past 30 years and has so much investment of money and enjoyment of people nationwide.

Thank you for your consideration.

Sincerely,

Kenneth A. Smith

DOCKET FILE COPY ORIGINAL

January 19, 1993

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JAN 27 1993

JAN 26 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Federal Communications Commission
1919 M St. NW
Washington DC 20544

JAN 27 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

JAN 26 1993

FCC MAIL ROOM
DOCKET FILE COPY ORIGINAL

Dear Sir or Madam,

I am very concerned about the proposed rules that are currently under consideration by the Federal Communications Commission. The proceeding is PR Docket 92-235. If adopted, the new rules will greatly reduce the usability of frequencies already assigned for model use and increase the risk of accidents and attendant liability for controlling model airplanes.

Our radio control frequencies are in the 72 - 76 MHz band, a band primarily used for private Land Mobile dispatch operations. However, our radio control frequencies in this band are far enough apart from the Land Mobile frequencies that we have been able to share the band without either use interfering with the other. Now the FCC wants to create more Land Mobile frequencies by splitting them into narrower bandwidths and rearranging the band plan. As a result, many Land Mobile frequencies will move closer to the radio control frequencies. I am told that of the 50 frequencies that are presently available for radio control of model airplanes, only 19 frequencies will be left if these new rules are adopted. Many thousands of dollars of radio control equipment owned by members of my club will be rendered useless.

When we fly our model airplanes we go through great lengths to assure the safety of the operators and bystanders and the protection of property. Our safety precautions involve the careful coordination and use of the assigned radio control frequencies. If the number of usable frequencies is diminished as proposed by the FCC, the remaining frequencies will become congested and the margin of safety will be greatly reduced. Please understand that many model airplanes have wing spans up to 10 feet, weigh as much as 30-40 pounds and fly at a high rate of speed. The models themselves are expensive to build; but more to the point, they are capable of causing property damage, serious injury, or even death if radio interference causes the operator to lose control of the craft. We need the use of our full compliment of radio frequencies in order to assure a safe flying environment.

I do not think it is wise for the FCC to seek to allocate more radio frequencies for Land Mobile users at the expense of radio control modelers. The FCC may not think we are as important as business users of radios, but we have a considerable investment in our models and radio equipment. The hobby provides many hours of enjoyment to thousands of people like myself and contributes to the advancement and development of the commercial aviation industry.

Please help me to continue the safe enjoyment of my pastime by not implementing NRPM PR Docket 92-235.

Sincerely,

Thomas J. Gadd

Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Dear Sirs:

It has recently come to my attention that the Federal Communications Commission (FCC) is considering an action that will severely limit and potentially eliminate a very important hobby of mine, radio controlled (R/C) model airplanes, helicopters, cars and boats.

Your Notice of Proposed Rule Making (NPRM) in PR Docket 92-235 replaces Part 90 of your rules with a new Part 88. Part 90 allows for safe use of R/C aircraft and surface models by keeping 10 Khz spacing between fixed commercial users and frequencies used by R/C enthusiasts. The new Part 88 will allow mobile users on frequencies within 2.5 Khz of frequencies available to us, eliminating safe use of at least 31 of the 50 channels on the 72 MHz band and 10 of the 30 frequencies on the 75 MHz band now used by hobbyists. In fact, more channels will likely be affected.

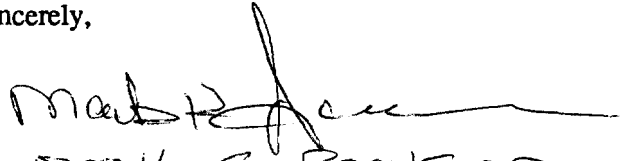
This action will have a severe, detrimental impact upon me and the entire R/C hobby industry. If put into effect, my airplane or helicopter could easily be shot out of the sky by a mobile user I'd have no way of knowing about. This creates a severe health hazard.

I have been involved in this hobby for 10 years. I own 20+ radios and 20+ model airplanes, helicopters, cars and boats. In addition, I have numerous engines, motors, chargers, field accessories and other products necessary to support my hobby. When you consider there are hundreds of thousands of other R/C hobbyists in the U.S. just like me, these proposed rule changes will affect a lot of people economically and in terms of enjoyment.

I urge you to reconsider this. Keep 10 Khz spacing between all frequencies on 75 MHz and 72 MHz bands available for safe use by R/C enthusiasts. Please don't eliminate this hobby that has grown tremendously over the past 30 years and has so much investment of money and enjoyment of people nationwide.

Thank you for your consideration.

Sincerely,


1702 1/2 S. ROCKFORD
TULSA, OK. 741207013

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1426 Monte Sano Blvd.
Huntsville, Alabama 35801\

18 January, 1993

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Federal Communications Commission
1919 M Street, N.W.
Washington, D.C.

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

JAN 26 1993

REG MAIL ROOM

Reference: NPRM-PR Docket 92-235

Sirs:

It is difficult to understand why a normally technically competent organization such as yours could, in good faith, conceive frequency sharing methodology such as that proposed in the reference NPRM. Simple calculations on the frequency tolerances allowed for both the affected services and receiver bandwidth specifications clearly show there is no margin for error and, in fact, there is no doubt **there will be interference**. Any technically competent person also recognizes that, regardless of the initial specifications, the equipment does change over time. Bandwidths change and frequencies shift unless periodic calibrations are required, which is not the case for any of the affected equipment.

You are also aware the power levels authorized the commercial users are significantly higher than allowed for model control and that interfering signals to a radio control system will produce an effect far more disastrous than interference with a voice channel. In addition, since the models typically fly at altitudes of several hundred feet, the aircraft will be susceptible to interference at distances many times further from the commercial units, which are primarily ground based, than will be the ground based commercial units from the radio control activities.

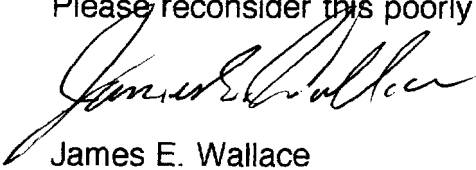
I have some major concerns. You will be creating a **very hazardous situation**. These models travel at velocities that can exceed 100 MPH and typically weigh under 10 pounds, but, the now popular quarter scale models raises these weights often to well over 30 pounds. At these weights and speeds, they are potentially lethal. The models are frequently operated in areas where an uncontrolled model could impact endangering both lives and property. In our case, our old airport was slowly being surrounded by housing and commercial activities. A new airport was built in another location. The old airport is now used for model flying and many other sports and civic activities (several soccer and baseball fields, a golf course, the new city stadium, etc.) which means many people are potentially in harm's way. Great care is exercised at the flying sites in our area to control frequency use to prevent interference problems. Your changes will essentially make that task almost impossible since the modelers have no control over the commercial users.

I would like to point out that there are probably well over 1,000,000 people actively engaged in this hobby and industry, all the way from middle school students to senior citizens. There are many millions of dollars invested that, to say the least, would be put at risk. This hobby is truly a learning experience whose side benefits affect many disciplines and people. If this NPRM is implemented, I have little doubt that the hobby and its pleasures and benefits will be seriously jeopardized.

I have been a practicing electrical engineer for over 35 years, a licensed amateur for 45 years and intimately associated with communications disciplines during that time. I am well aware of the scarcity of spectrum and its utilization and satisfying all demands is difficult.

I should like to also point out that this potential change does not affect me since I operate on the 50/54 mhz amateur band but it is my concern for the radio control community in general that prompted this letter.

Please reconsider this poorly conceived NPRM.

A handwritten signature in black ink, appearing to read "James E. Wallace", written in a cursive style.

James E. Wallace

Max E. Ruble
1108 Sandstone Dr.
St. Louis, MO 63146
(314)434-2152

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January 23, 1993

Federal Communication Commission
1919 M Street NW
Washington, DC 20554

92-235

Dear Sirs:

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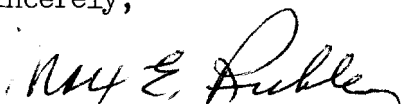
This action will have a severe, detrimental impact upon me and the entire R/C hobby industry. If put into effect, my airplane could easily be shot out of the sky by a mobile user I'd have no way of knowing about. This creates a severe health hazard.

I have been involved in this hobby for 20 years. I own 5 radios and 8 model airplanes. In addition, I have numerous engines, motors, chargers, field accessories and other products necessary to support my hobby. When you consider there are hundreds of thousands of other R/C hobbyists in the U.S. just like me, these proposed rule changes will affect a lot of people economically and in terms of enjoyment.

I urge you to reconsider this. Keep 10 Khz spacing between all frequencies on 75 MHz and 72 MHz bands available for safe use by R/C enthusiasts. Please don't eliminate this hobby that has grown tremendously over the past 30 years and has so much investment of money and enjoyment of people nationwide.

Thank you for your consideration.

Sincerely,



Max E. Ruble

MER/rr